

11740-PAJ

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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GREAT AMERICAN INSURANCE	:	07 CIV 6421 (PAC) (THK)
COMPANY OF NEW YORK,	:	
Plaintiff,	:	
v.	:	
	:	ANSWER TO
ADVANCE OCEAN INC., NIPPON YUSEN	:	CROSS-CLAIMS
KAISHA, NYK (NORTH AMERICA) INC.,	:	
BURLINGTON NORTHERN SANTA FE	:	
CORPORATION, BNSF RAILWAY	:	
COMPANY, THE BURLINGTON	:	
NORTHERN AND SANTA FE RAILWAY	:	
COMPANY,	:	
Defendants.	:	
-----	X	

Defendant, **ADVANCE OCEAN INC.**, by its attorneys, **JUNGE & MELE, LLP**, hereby sets forth the following as its Answer to the Cross-Claims of Defendants, **BURLINGTON NORTHERN SANTA FE CORPORATION, BNSF RAILWAY COMPANY, THE BURLINGTON NORTHERN AND SANTA FE RAILWAY COMPANY**:

FIRST: Answering Defendant repeats and re-alleges each and every admission, denial and defense set forth in its Answer to the Amended Complaint with Cross-Claims, as if more fully set forth at length herein.

SECOND: Answering Defendant denies each and every allegation contained in paragraphs "TWENTY-SIXTH," "TWENTY-SEVENTH" and "TWENTY-EIGHTH" in the "FIRST CROSS-CLAIM" and "SECOND CROSS-CLAIM" of Defendants,

BURLINGTON NORTHERN SANTA FE CORPORATION, BNSF RAILWAY
COMPANY, THE BURLINGTON NORTHERN AND SANTA FE RAILWAY
COMPANY.

WHEREFORE, Answering Defendant demands that the Cross-Claims be
dismissed with costs to Answering Defendant as against cross-claiming Defendants, and
that the Court grant such other, further and different relief as the justice of the cause may
require.

Dated in the City of New York on January 2, 2008

Respectfully submitted,

JUNGE & MELE, LLP
Attorneys for Defendant
Advance Ocean Inc.

/s/ Peter A. Junge

By _____
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